

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF MICHIGAN**

In re CASSAVA SCIENCES, INC.  
SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS.

) Misc. Case No. 2:24-mc-51329-MAG-  
) DRG

Honorable Mark A. Goldsmith

Originating No. 1:21-cv-00751-DAE  
(W.D. Tex.)

## CLASS ACTION

JOINT NOTICE OF WITHDRAWAL  
OF PLAINTIFFS' MOTION TO  
COMPEL THE PRODUCTION OF  
DOCUMENTS FROM NON-PARTY  
DR. HOAU-YAN WANG

By this Notice, lead plaintiff Mohammad Bozorgi and plaintiffs Ken Calderone and Manohar Rao (collectively, “Plaintiffs”) in the underlying litigation pending in the United States District Court for the Western District of Texas and non-party Dr. Hoau-Yan Wang (“Dr. Wang”) (together with Plaintiffs, the “Parties”) jointly provide notice to the Court of the withdrawal of Plaintiffs’ Motion to Compel the Production of Documents from non-party Dr. Hoau-Yan Wang (ECF 1) (“Motion to Compel”).

1. Plaintiffs filed their Motion to Compel on November 18, 2024, seeking to compel Dr. Wang to produce: (1) the transcripts of his deposition testimony provided to the United States Securities and Exchange Commission (“SEC”) and any exhibits thereto; and (2) a May 14, 2020 email to Dr. Wang. ECF 1. Dr. Wang filed his opposition on December 2, 2024 (ECF 5) and Plaintiffs filed their reply in support of the Motion to Compel on December 9, 2024 (ECF 6).

2. On December 11, 2024, the Court set a hearing for the Motion to Compel for December 18, 2024. ECF 7. On December 16, 2024, the Court reset the hearing for December 23, 2024 via a text-only docket entry.

3. On December 23, 2024, the Parties informed the Court, prior to the hearing, that the issues raised in the Motion to Compel were resolved.

4. The same day, the Court cancelled the December 23, 2024 hearing via a text-only docket entry.

5. The Parties have complied fully with the agreement they reached on December 23, 2024.

6. Accordingly, Plaintiffs' Motion to Compel is moot and the Parties agree it should be withdrawn.

For these reasons, the Parties respectfully submit this Joint Notice of Withdrawal of Plaintiffs' Motion to Compel, ECF 1.

DATED: February 21, 2025

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DANIEL S. DROSMAN  
(California Bar No. 200643)  
KEVIN A. LAVELLE  
(California Bar No. 292442)  
MEGAN A. ROSSI  
(California Bar No. 318643)  
HEATHER GEIGER  
(California Bar No. 322937)  
JEREMY W. DANIELS  
(California Bar No. 351347)

s/ Kevin A. Lavelle  
\_\_\_\_\_  
KEVIN A. LAVELLE

655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
dand@rgrdlaw.com  
klavelle@rgrdlaw.com  
mrossi@rgrdlaw.com  
hgeiger@rgrdlaw.com  
jdaniels@rgrdlaw.com

Lead Counsel for Lead Plaintiff and  
Additional Plaintiff Ken Calderone

THE MILLER LAW FIRM, P.C.  
SHARON S. ALMONRODE (P33938)  
950 West University Drive, Suite 300  
Rochester, MI 48307  
Telephone: 248/841-2200  
ssa@millerlawpc.com

Local Counsel

KENDALL LAW GROUP, PLLC  
JOE KENDALL  
(Texas Bar No. 11260700)  
3811 Turtle Creek Blvd., Suite 825  
Dallas, TX 75219  
Telephone: 214/744-3000  
214/744-3015 (fax)  
jkendall@kendalllawgroup.com

Local Counsel for Lead Plaintiff and  
Additional Plaintiff Ken Calderone

GLANCY PRONGAY & MURRAY LLP  
CHARLES H. LINEHAN  
(California Bar No. 307439)  
1925 Century Park East, Suite 2100  
Los Angeles, CA 90067  
Telephone: 310/201-9150  
310/201-9160 (fax)  
clinehan@glancylaw.com

Counsel for Additional Plaintiff Manohar  
K. Rao

DATED: February 21, 2025

s/ with consent of Jennifer L. Beidel

JENNIFER L. BEIDEL

DYKEMA GOSSETT PLLC  
39577 Woodward Avenue, Suite 300  
Bloomfield Hills, MI 48304  
Telephone: 248/203-0700  
jbeidel@dykema.com

Counsel for Dr. Hoau-Yan Wang

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on February 21, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses of counsel of record.

s/ Kevin A. Lavelle

---

KEVIN A. LAVELLE (California Bar No. 292442)

ROBBINS GELLER RUDMAN

& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: 619/231-1058

619/231-7423 (fax)

Email: klavelle@rgrdlaw.com